

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of:

Inventors: Tue Nguyen and Tai Dung Nguyen

Application No.: 09/898,439

Confirm. No.: 1885

Filed: July 5, 2001

Title: PLASMA SEMICONDUCTOR
PROCESSING SYSTEM AND METHOD

PATENT APPLICATION

Art Unit: 2818

Examiner: Quoc Dinh Hoang

Atty. Docket No. TEGL-01165US0

CUSTOMER NO. 23910

REPLY BRIEF UNDER 37 C.F.R. § 41.41

Mail Stop Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

This Reply Brief is being submitted in response to the Examiner's Answer which was mailed on January 4, 2008.

In the Response to (A) of the Argument portion of the Examiner's Answer, the Examiner writes that "Amagasa teaches in fig. 4 an electrode (coil conductor 52)." See Answer, page 7. Dictionary.com defines "electrode" as

2. A collector or emitter of electric charge or of electric-charge carriers, as in a semiconducting device.

In contrast, Amagasa teaches use of a coil to introduce inductance into an electric circuit and an insulator between coil turns to increase distributed capacitance.

Referring to FIG. 1, Amagasa teaches use of a coil as an inductor in a circuit to convert AC current to DC current.

Referring to FIG. 2, Amagasa teaches a coil that acts as a field coil in a dynamo (“the coil device 24 is a field coil, which is combined with an armature coil 30.”) See col. 3, lines 27-28. As a field coil, a coil generates a magnetic field through application of current to the coil.

Referring to FIG. 3, Amagasa teaches a low-pass filter formed of the inductance of the coil and the distributed capacitance increased by an insulator between turns of the coil.

The coils of FIGS. 4-6, used in the circuits of FIGS. 1-3, are not electrodes. Nowhere does Amagasa disclose, teach, or describe an electrode, i.e., a collector or emitter of electric charge or of electric-charge carriers.

In the Response to (B) of the Argument portion of the Examiner’s Answer, the Examiner writes that “In response to applicant’s argument that ‘Ye and Amagasa are not from the same field of endeavor’... This argument is not convincing, especially since both Ye and Amagasa teaches spiral coil 12 and spiral coil 52, respectively.” See Answer, page 8.

Applicants respectfully submit that while Ye and Amagasa both teach spiral coils, Amagasa does not teach an electrode. Amagasa teaches a low-pass filter and an inductor, and explicitly teaches use of the spiral coil to suppress high frequency voltages (“The present invention can suppress overvoltage surges and high frequency voltages...”). Ye teaches a spiral coil electrode that couples Radio Frequency (RF) voltage to a plasma. Amagasa teaches suppressing RF voltage, yet Ye requires RF voltage. The two references are incompatible, and Amagasa teaches away from use with Ye.

CONCLUSION

The Remarks above are in reply to the Response to Argument of the EXAMINER’S ANSWER, and are meant to supplement the APPELLANT’S APPEAL BRIEF filed August 10, 2007, and the SUPPLEMENTAL SUBMISSION AMENDING APPELLANT’S APPEAL BRIEF filed October 1, 2007. For all the above reasons submitted in this and previous submissions (with

the exception of arguments retracted in the SUPPLEMENTAL SUBMISSION), Appellants respectfully submit:

A. Independent claims 30 and 38 are patentable under 35 U.S.C. § 102(b) over Amagasa, and

B. Claims 35 and 36 are patentable under 35 U.S.C. § 103(a) over Ye and Amagasa.

Appellants respectfully request that the Board reverse the rejections on claims 30 and 38 under 35 U.S.C. § 102(b) and the rejections on claims 35 and 36 under 35 U.S.C. § 103(a) and direct the Examiner to enter a Notice of Allowance for claims 30, 35, 36 and 38.

It is not believed that any additional fees are due at this time. However, if there are, the Commissioner is authorized to charge the required fees and any underpayment of fees or credit any overpayment to Deposit Account No. 06-1325, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: March 4, 2008

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